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April 9, 2010

Via Hand Delivery

Mr. Mike Elabarger
Project Manager
Loudoun County Department of Planning
1 Harrison Street, SE, Third Floor
Leesburg, VA 20177

**Re: Loudoun Youth Soccer Association, Inc. Lighting Special Exception
(SPEX 2009-0036)**

Dear Mr. Elabarger:

Loudoun Youth Soccer Association, Inc. (hereinafter the "Applicant") provides this letter as a written response to the referral agency comments provided for the above referenced application. For your convenience, each of the Staff comments are listed below, followed by the Applicant's responses in bold italics.

**COUNTY OF LOUDOUN DEPARTMENT OF PLANNING, COMMUNITY PLANNING
(Kelly Williams, 2/22/10)**

EXECUTIVE SUMMARY

The Loudoun Youth Soccer Association, Inc. requests a Special Exception to permit lighting that does not meet the standards of the Revised 1993 Zoning Ordinance. The use of recreation fields on the property is a permitted use in the JLMA-20 zoning district, however the lighting as proposed exceeds the standards and requires special exception approval. Specifically, the applicant is requesting approval of lighting that exceeds 0.25 foot candles above background light levels measured at the boundary of the property as it abuts adjacent properties. The greatest impact would be a maximum of 8.51 foot candles on the adjacent Phil Bolen Park property.

Staff recommends approval of the proposal as the site is surrounded by uses which generally will not be affected by lighting that may spill over the boundary. The adjacent

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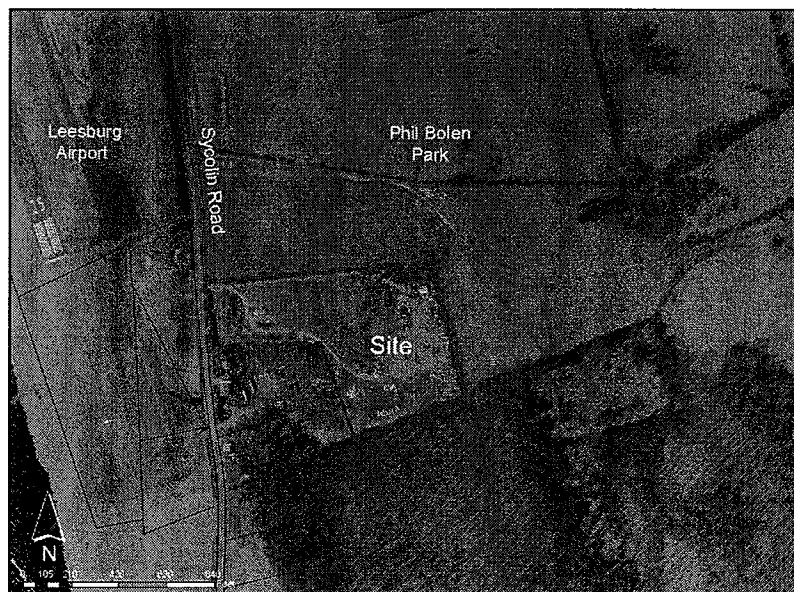
uses include the Leesburg Airport, Phil Bolen Park, and a commercial nursery. As proposed, spill over would occur only on the Phil Bolen Park property which is planned for both passive and active recreational uses, including lighted ball fields. Additionally, the applicant has proposed hours of operation that are similar to existing facilities within the county which should pose no undue hardship on the adjacent properties.

BACKGROUND

The subject property, approximately 11.88 acres, is located east of Sycolin Road, north of Cochran Mill Road, and south of the future alignment of Crosstrail Boulevard. It is bounded by a Phil Bolen Park to the north, east and south, a commercial nursery to the south and the Leesburg Airport to the west (See Vicinity Map). The property is zoned JLMA-20 (Joint Land Management Area).

A review of County GIS records indicates wetlands, steep slopes, and moderately steep slopes on-site, however they are located in an area that will not be impacted by the lighting which is the subject of this application.

Vicinity Map



COMPLIANCE WITH THE COMPREHENSIVE PLAN

The site is governed under the policies of the Revised General Plan, the Countywide Transportation Plan (CTP), and the Bicycle and Pedestrian Mobility Master Plan (BPMMP). The site is contained within the Leesburg Joint Land Management Area (JLMA) and is planned for Business uses.

The proposed application has been reviewed under the Revised General Plan Towns Policies of Chapter 9 and the Green Infrastructure policies of Chapter 5.

ANALYSIS & RECOMMENDATION

Lighting

The Plan promotes sound night-lighting standards that will “reduce light pollution such as glare, energy waste, light trespass, and the deterioration of the natural nighttime environment” (Revised General Plan, Chapter 5, Lighting and the Night Sky, text). The Light and Glare Standards of the Revised 1993 Zoning Ordinance (Section 5-1504(A)) specifies that all sources of glare must not cause illumination in excess of 0.25 foot candles above background light levels measured at the boundary of the property as it abuts the adjacent lot. A Special Exception is requested so that the lighting on the outdoor fields may exceed these standards.

Specifically, six light poles are proposed to illuminate the athletic fields on the southern most portion of the site. The applicant has included an illumination summary depicting the anticipated light intensities on the perimeter of the property based on Musco light fixtures. The analysis identifies several locations along the site’s southern boundaries where the outdoor lighting will spill over onto the Phil Bolen Park site which is also planned for active recreational uses, including lighted ballfields. The greatest impact would be a maximum of 8.51 foot candles in the south west corner of the site.

Staff recommends approval of the proposal as the site is surrounded by uses which generally will not be affected by lighting that may spill over the boundary. The applicant has proposed hours of operation that are similar to existing facilities within the county which should pose no undue hardship on the adjacent properties. Staff recommends that commitments be made to the type of lighting that will be provided (e.g., maximum height of poles, intensity of lighting (maximum foot candles), a design that reduces spillover, etc.) and to the hours of operation.

Applicant Response:

The Applicant concurs with Staff’s assessment of the minimal impact that the proposed lighting will have on neighboring properties. The Applicant has drafted a set of conditions of approval (enclosed) that address the lighting restrictions mentioned by Staff.

COUNTY OF LOUDOUN DEPARTMENT OF BUILDING AND DEVELOPMENT, ZONING ADMINISTRATION (Brian Fish, 2/19/10)

I. APPLICATION SUMMARY

Applicant: Loudoun Youth Soccer Association, Inc.

Proposal: Special Exception to allow lighting that does not meet the standards of Section 5-1504(A), pursuant to Section 5-1404(C).

II. PROPERTY SUMMARY

Parcel Number (MCPI): 192-36-5833-000

Property Size (Legal Acreage): 11.88 Acres

Base Zoning: JLMA-20 (Joint Land Management Area - 20) (ZO Section 2-1300)

Zoning Overlay Districts: Airport Impact Overlay District

III. MATERIALS REVIEWED BY ZONING ADMINISTRATION:

The Zoning Administration comments provided in this referral are based on a review of the following documents submitted with the application:

- 1) Information Sheet.
- 2) Statement of Justification dated January 7, 2010.
- 3) Special Exception Plat revised through December 22, 2009.
- 4) Lighting Summary dated September 4, 2009.

IV. COMMENTS

Zoning Administration has the following comments regarding conformance with the Revised 1993 Loudoun County Zoning Ordinance ("the Ordinance"):

1. Staff recommends that the Conditions of Approval include hours during which lighting is to be permitted.

Applicant Response:

The Applicant has drafted a condition of approval that addresses the hours during which lighting is to be permitted.

2. Staff recommends that the Conditions of Approval include substantial conformance to the Special Exception plat.

Applicant Response:

The Applicant has drafted a condition of approval that addresses substantial conformance to the lighting plan of the Special Exception Plat.

3. Staff notes that the Legend on Sheet 2 simply refers to the lighting isometric as "Proposed Lighting Isometric (foot candles)". Are these proposed to be maximum, average, or approximate lighting levels? Additional clarification is required.

Applicant Response:

The lighting isometric listed on Sheet 2 refers to the maximum horizontal foot candle levels.

4. Staff notes that the review of this Special Exception application only included a review of the proposed field lighting, and did not include a comprehensive review of the proposed *rural recreation establishment, outdoor* for conformance with Zoning Ordinance requirements.

Applicant Response:

While the Applicant understands that the Staff review of this application is limited to lighting, Staff should be reassured by the following information.

As stated in the Revised 1993 Loudoun County Zoning Ordinance, the rural recreation establishment, outdoor use, which is a permitted use by-right in the JLMA-20 zoning district, is defined as, "Any establishment operated as a commercial enterprise in which seasonal facilities directly related to outdoor recreation are provided for all or any of the following: camping, skating rink (outdoor), lodging, picnicking, boating, fishing, swimming, outdoor games and sports, animal-mounted trail riding, and activities incidental and related to the foregoing. This use may include a refreshment stand as an accessory use. Nothing in this definition shall be construed to mean a track for motorized vehicles of any type, however defined."

Clearly, this definition permits "outdoor games and sports", which is the specific recreation use that will be implemented on the subject property. The proposed recreation use complies with the parameters of the rural recreation establishment, outdoor use as defined in the Zoning Ordinance.

COUNTY OF LOUDOUN OFFICE OF TRANSPORTATION SERVICES (Marc Lewis-DeGrace, 3/19/10)

Background

This Special Exception (SPEX) application seeks to allow lighting on soccer fields that does not meet standards set by the Revised 1993 Zoning Ordinance. The site is located on the east side of Sycolin Road (Route 643), adjacent to Loudoun County's Leesburg Park and Ride Lot and Philip A. Bolen Memorial Park. Access to the site is provided via an existing site driveway. A vicinity map is provided as *Attachment 1*.

In its consideration of this application, the Office of Transportation Services (OTS) reviewed materials received from the Department of Planning on January 8, 2010, including (1) a statement of justification prepared by the Applicant, (2) a special exception plat (plan set) prepared by Bohler Engineering dated November 11, 2009 revised through December 22, 2009, and (3) a Traffic Statement prepared by Wells and Associates dated November 16, 2009.

Existing, Planned and Programmed Transportation Facilities

The site is located just outside of the Town of Leesburg within the Leesburg Joint Land Management Area (JLMA). Major roadways serving the site are described below. OTS review of existing and planned transportation facilities is based on the 2001 Revised Countywide Transportation Plan (2001 Revised CTP) and the 2003 Bicycle & Pedestrian Mobility Master Plan (2003 Bike & Ped Plan).

Sycolin Road (Route 643) (segment from Route 659 northwest to Battlefield Parkway) is classified by the 2001 Revised CTP as a minor collector road. It is currently built as a two-lane (R2) road within a variable right-of-way (ROW). A recent project by the Virginia Department of Transportation (VDOT) has paved the entire road. The 2001 Revised CTP calls for Sycolin Road to be widened to a four-lane divided (U4M) facility within a 90-foot ROW and reclassified. A segment of Sycolin Road just to the north of the site has been widened by Loudoun County, installing left- and right-turn lanes at Loudoun Center Drive and a left-turn lane at Claudia Drive, (the entrance to the Leesburg Park and Ride Lot). The Town of Leesburg is in the process of widening Sycolin Road to four lanes within the Town Limits. According to the most recent data provided by VDOT (2008), Sycolin Road carries 3200 daily vehicle trips.

The 2003 Bike & Ped Plan classifies Sycolin Road as a "baseline connecting roadway" along which bicycle and pedestrian facilities are envisioned. There are multi-use trails on either side of Sycolin Road to the north of the site from the Leesburg Town Limits south to Claudia Drive (a distance of approximately 1500 feet). These facilities were constructed as part of the recent Loudoun County widening project.

Review of Applicant's Submitted Traffic Statement

The Applicant's submitted traffic statement (*Attachment 2*) reviewed the existing conditions along Sycolin Road (Route 643) at the site entrance and the impacts of the proposed use on the roadway. The traffic statement indicates that the four fields proposed on the site (i.e., two full-size lighted soccer fields and two smaller unlighted "play areas") should be counted as three fields given the smaller size and capacity of the "play areas". Using rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation (8th Edition)*, vehicle trips generated by the proposed fields are as follows:

Trip Generation Analysis

Land use / Time Period	ITE Code	Amount	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Soccer Complex	488	3 Fields						
Adjacent Street Peak Hour Generator			2	2	4	43	19	62
Peak Hour of Generator			5	4	9	21	44	65

Source: Wells + Associates Traffic Statement (11/16/2009)

The traffic statement notes even if the lighting of the fields moved the PM peak hour of the generator (fields) to be coincident with the adjacent street (commuter) PM peak hour, an addition of only five percent (three vehicle trips) would result. The traffic statement concludes that this is not a significant traffic increase.

The traffic statement also analyzed the need for left and right turn lanes on Sycolin Road at the site entrance, and determined that neither is warranted. Analysis of each is provided as part of *Attachment 2*.

Transportation Comments

1. The Leesburg Executive Airport Master Plan and Capital Improvement Plan calls for an extension of the airport runway in the future. The runway extension will require a realignment of Sycolin Road (Route 643), which is anticipated to impact the Applicant's property generally as indicated on *Attachment 3*. This realignment is also shown on the Town of Leesburg's Transportation Plan and noted in the draft 2010 Loudoun County CTP. It is recommended that the Applicant contact both Leesburg Executive Airport and the Town of Leesburg to coordinate development of this site with respect to this road realignment.

Applicant Response:

The Applicant is aware of the anticipated realignment of Sycolin Road along the subject property's frontage and has been in contact with the Town of

Leesburg Executive Airport and the Town of Leesburg about the proposed lighting application. The Town of Leesburg referral, which solicited input from the Town of Leesburg Executive Airport, did not address the issue of a realigned Sycolin Road since the proposed special exception application is based solely on a lighting issue.

2. Loudoun County is currently in the process of selecting an engineering firm to design Crosstrail Boulevard, a segment of which is proposed to pass through Phil Bolen Park just east of this site. Please be aware that the ultimate location of Crosstrail Boulevard may deviate from the alignment depicted on the Applicant's special exception plat and impact the Applicant's lot/proposed fields.

Applicant Response:

The Applicant is aware of the planned location of Crosstrail Boulevard as it passes by the subject property. This alignment has changed in the past to address concerns regarding the purchasing of additional right-of-way, its impact on private properties and its future connection to the Greenway. The current alignment takes advantage of Crosstrail Boulevard's location on public property while aligning it with the Shreve Mill Road interchange to the south and west. This alignment avoids as many private properties as possible. It is the Applicant's understanding that this is the preferred alignment of the Town of Leesburg and Loudoun County for the reasons stated above.

3. Please ensure that the lighting for the soccer fields is not directed toward existing or future planned roads.

Applicant Response:

The conditions of approval mandate that a certain type of lighting be used for the lighted fields. This lighting is the most advanced at providing shielded and downward focused lighting with minimal spillover onto adjacent properties or roads.

TOWN OF LEESBURG (Irish Grandfield, 2/4/10)

Loudoun Youth Association has submitted a special exception application for construction of lighted ball fields at 19789 Sycolin Road south of the Leesburg

Corporate limits. The proposed facility is not in conflict with policies of the Town Plan and seems reasonable, as explained in the statement of justification. Staff has reviewed the proposal and has no objections to its approval.

Applicant Response:

In speaking with Mr. Tim Deike of the Town of Leesburg Airport, the Applicant notes that this statement from the Town of Leesburg is inclusive of the Town of Leesburg Airport's input regarding the proposed use.

In meeting with Mr. Deike, it was conveyed to the Applicant that the proposed height of the lighting poles is not a concern for the airport. The only concern would be the shielding of the lighting as to avoid unnecessary light spillage upward that may confuse or distract pilots. The Applicant is able to address this concern by conditioning to a specific type of lighting that minimizes light spillage to the maximum extent possible through the shielding and focusing of the lights inward and downward toward the field surfaces.

COUNTY OF LOUDOUN PARKS, RECREATION AND COMMUNITY SERVICES
(Brian G. Fuller, 3/19/10)

BACKGROUND AND ANALYSIS:

The Property is located on the east side of Sycolin Road, east of the Town of Leesburg Airport, south of the Leesburg Park and Ride Lot, and adjacent to the western boundary of Philip A. Bolen Memorial Park. The Property consists of approximately 11.88 acres within the Leesburg JLMA Policy Area. The Property is zoned JLMA-20 and owned by James J. Hogan, Jr.

The Loudoun Youth Soccer Association (LYSA) is seeking to construct 2 large soccer fields on the property, which is permitted as a "rural recreation establishment, outdoor" use in the JLMA-20 zoning district. However, the Applicant wants to light the fields, and therefore, a Special Exception to permit lighting that does not meet the standards of Section 5-1504(A) of the Revised 1993 Zoning Ordinance, pursuant to Section 5-1504(C) is required. The Applicant anticipates that the hours of operation will be 5:00pm to 10:00pm on weekdays and 8:00am to 10:00pm on weekends, similar to County-owned active athletic facilities.

POLICY:

The site is governed under the land use policies in the Revised General Plan, the Loudoun County Bicycle and Pedestrian Mobility Master Plan, and the Revised Countywide Transportation Plan (Revised CTP). The subject site is located within the Leesburg Planning Area and the Leesburg JLMA Policy Area. The Planned Land Use Map adopted with the Revised General Plan identifies the subject site as planned for Business, which include components of public/civic uses and parks and open space.

COMMENTS:

With respect to Parks, Recreation and Community Services (PRCS) we offer the following comments to the application proposal:

1. PRCS has partnered with LYSA for many years, and supports the Applicant's proposal to provide additional lighted athletic fields in Loudoun County. The need for additional ballfields in the County has been well documented.

Applicant Response:

Comment noted.

2. Staff notes that the proposed location for the eastern soccer field is in very close proximity to the future, proposed Crosstrail Boulevard. Staff recommends coordinating with the Office of Transportation Services and their contracted design engineers on the location of Crosstrail Boulevard. The Applicant may need to consider additional buffering and/or fencing to protect players and soccer balls from entering the future roadway.

Applicant Response:

The fields will be in a cut and will have retaining walls protecting a portion of the fields from the future roadway. Since the location of the roadway has not been finalized, fencing may not be necessary, and may be more appropriate to be part of the roadway design, if needed.

3. It appears that the Concept Plan shows potential impacts to moderately steep slopes and wetlands. The Applicant should demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the potential impact to moderately steep slopes and wetlands will be mitigated.

Applicant Response:

The moderately steep slopes have previously been disturbed, as has much of the subject property. The proposed land disturbance will have a minimal impact on the moderately steep slopes.

The wetlands have been field located and are more accurate than existing Loudoun County maps. The anticipated grading operations will not overly impact the wetlands. A wetlands permit will be obtained for any disturbance that does occur to the wetlands.

It should be noted that the site driveway will be moved from its current location as far north as possible to avoid as much of the moderately steep slopes and wetlands as possible. This will result in the submission of a buffer width modification waiver along the northern property boundary. The requisite amount of buffer plantings will be provided, but the width of the buffer will be reduced to move the site driveway as far north as possible, which will minimize its impact on the moderately steep slopes and wetlands. Some disturbance is inevitable, and as mentioned above the site has previously been extensively disturbed; however, it is the Applicant's intention to minimize its land disturbance as much as possible, especially to the more sensitive areas of the subject property.

4. Please provide additional information on the proposed uses of the existing buildings (to remain) around the large parking lot.

Applicant Response:

The existing building will be converted into an accessory refreshment stand and accessory office use.

COUNTY OF LOUDOUN DEPARTMENT OF FIRE, RESCUE AND EMERGENCY MANAGEMENT (Maria Figueroa Taylor, 2/18/10)

Thank you for the opportunity to review the above captioned application.

The Fire-Rescue GIS and Mapping coordinator offered the following information regarding estimated response times:

PIN	Project name	Leesburg VF-RC Travel Time
192-36-5833	LYSA	5 min, 12 sec (fire, station 20) 6 minutes (rescue, station 13)

Travel times are determined using ESRI GIS network analyst along the county's street centerline with distance and speed limit being the criteria. Travel time is reported in minutes and seconds. For the approximate response time two minutes is added for turnout time.

Project name	Leesburg VF-RC Response Times
LYSA	7 min, 12 sec (fire, station 20) 8 minutes (rescue, station 13)

Applicant Response:
Comments noted.

It is the Applicant's hope that the responses provided in this letter adequately address and resolve Staff comments. In the interest of moving the application forward in a manner that allows certainty in the development of the fields, the Applicant will be applying for this application to be double-advertised for a Board of Supervisors Public Hearing shortly following the Planning Commission Public Hearing Scheduled for Wednesday, May 26, 2010. Please do not hesitate to contact me if you have any questions or comments concerning this referral response letter.

Sincerely,

WALSH, COLUCCI, LUBELEY, EMRICH
& WALSH, P.C.



Michael Romeo, AICP
Land Use Planner

Enclosures: Draft Conditions of Approval
Updated Plat
Timeline Extension Letter
Double Advertising Request

cc: Caroline Deutsch, Loudoun Youth Soccer Association, Inc.
Jamie Hogan
David Logan, Bohler Engineering, Inc.
Kevin Sitzman, Wells + Associates, LLC
J. Randall Minchew, Esq., Walsh, Colucci, Lubeley, Emrich & Walsh, P.C.